

Honorable James L. Robart

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

VHT, INC., a Delaware corporation,
Plaintiffs,

v.

ZILLOW GROUP, INC., a Washington
corporation; and ZILLOW, INC., a
Washington corporation,
Defendant(s).

Case No. 2:15-cv-01096-JLR

ZILLOWS' [PROPOSED]
VOIR DIRE INSTRUCTIONS AND
QUESTIONS

Defendants Zillow Group, Inc. and Zillow Inc. hereby proposed the following voir dire instructions and questions:

This is a civil lawsuit brought by VHT, Inc. against Zillow, Inc. and the Zillow Group. VHT contends that Zillow infringes VHT's copyrights in certain photographs of real estate properties.

VHT is a Chicago-based professional photography company that specializes in taking pictures of homes being listed for sale. Zillow is based in Seattle and is a website with information about real estate.

1 In this suit, VHT alleges that Zillow is infringing VHT's copyrights in its photographs by
2 using those photographs in the home-improvement section of Zillow's website, which is known as
3 "Digs."
4

5 **Voir Dire Questions**

- 6 1. Have you ever testified in a deposition or in court?
7 2. Have you ever previously served on a jury?
8 3. Have you ever served as the foreperson on a jury?
9 4. Have you ever or a close family member ever been party to a lawsuit?
10 5. Have you ever formed your own business?
11 6. Do you or does any close family member have any experience with copyrights?
12 7. Have you or a close family member been involved in any disputes or litigation involv-
13 ing intellectual property, such as patents, trademarks, or copyrights?
14 8. Do you or does any close family member work in the real estate industry?
15 9. Have you read, seen, or heard anything about this lawsuit?
16 10. Have you ever been a member of, or contributed any money or other support to, any or-
17 ganization that sought to change laws relating to litigation and the civil justice system?
18 11. Do you personally know any of the following individuals, who may appear as witnesses
19 in this case:

20 Robert Henson
21 Dr. Ward Hanson
22 Victor Lund
23 Jeffrey Sedlik
24 Patrick F. Gannon
25 John H. Vogel, Jr.
26 Brian Balduf
27 Michael Emerson
John Bosch
Kevin McGuire
Chris Baker
Doug Angelaccio
Flatworld Solutions, Inc.
MicrostockSolutions, LLC
Kristin Acker
Ben Schielke

Jonas Boli
Jason Gurney
Greg Schwartz
Curt Beardsley
Sara Bonert
Alex Kutner
Lynette Lewis
Errol Samuelson
Kathleen Philips
Kimber VanRy

12. Do you personally know any of the following individuals, who may appear as a lawyer or party representative in this case?

Edgar G. Sargent
Ian B. Crosby
Genevieve Vose Wallace
Jenna Farleigh
Jordan Connors
Parker C. Folse
Brook A. M. Taylor
Patrick C. Bageant
Brad Owens
Michelle Wynne
Jonathan M. Lloyd
James L. Howard
Max B. Hensley
Marcia B. Paul
Stellman Keehnel
Andrew R. Escobar
Andrew L. Deutsch
Melissa A. Reinckens

13. Do you have any physical or medical problems that would make it difficult for you to serve on this jury?

14. Is there any additional information you feel the Court should know or that might be relevant to this trial in any way?

15. Is there any reason whatsoever not previously expressed why you would be uncomfortable or have difficulty serving on this jury?

Dated: January 17, 2016

Respectfully submitted,

By: /s/ Edgar G. Sargent

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Attorneys for Zillow Group, Inc. and Zillow, Inc.

CERTIFICATE OF SERVICE

I hereby certify that on January 17, 2017, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to all counsel of record.

/s/ Edgar G. Sargent

Attorney Signature